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*Attorneys for Plaintiff RED HAT, INC.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

RED HAT, INC.,

Plaintiff,

v.

VIRTAMOVE, CORP.,

Defendant.

CASE NO. 5:24-CV-04740-PCP

**PLAINTIFF RED HAT'S NOTICE OF  
FILING UNSEALED VERSION OF  
PREVIOUSLY SEALED REPLY IN  
SUPPORT OF ITS CONTINGENT  
MOTION TO CONDUCT  
JURISDICTIONAL DISCOVERY**

Pursuant to the Court's April 21, 2025 Order Granting VirtaMove, Corp's Motion to Dismiss, Denying Motions to Seal, and Denying Red Hat, Inc.'s Motions for Contingent Discovery and to Amend the Complaint (Dkt. 70), Plaintiff Red Hat, Inc. ("Red Hat") provides notice of filing of the public and unsealed copy of Red Hat's previously sealed Reply in Support of Its Contingent Motion to Conduct Jurisdictional Discovery ("Reply") (Dkt. 45-3).<sup>1</sup> Attached hereto as **Exhibit A** is Red Hat's unsealed Reply.

DATED: May 6, 2025

Respectfully submitted,

KIRKLAND & ELLIS LLP

/s/ Yvonne Beeler

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<sup>1</sup> Exhibits 1 and 2 in support of Red Hat's Reply were filed publicly and unsealed by Defendant VirtaMove, Corp. (*see* Dkt. 76).